

**SECTION I: GENERAL  
INFORMATION****CR-ERNS Number:**

826306

625807

**Date of Initial Release:** Ongoing**Date of Initial Call to NRC:** 02/12/2007**Type of Report:** Indicate below the type of report you are submitting.☐

Initial Written Notification

☒First Anniversary  
Follow-up  
Report☐Written Notification  
of a Change to  
Initial Notification☒Written Notification  
of a Change to  
Follow-up Report

**Signed Statement:** I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Stan Sander, Managing Director

Name and Position

2-2-2008

Date

Stan Sander

Signature

**Part A. Facility or Vessel Information****Name of Facility or Vessel**

Baldwin Energy Complex

**Person  
in Charge  
of Facility  
or Vessel**

Name of Person in Charge

Stan Sander

Position

Managing Director

Telephone No. (618)

785-3212

Alternate Telephone No. (618)

785-3244

**Facility  
Address or  
Vessel  
Port of  
Registration**

Street

10901 Baldwin Road

County

Randolph

City

Baldwin

State

IL

Zip Code

62217

**Dun and Bradstreet Number for Facility**

804405074

**Facility/Vessel  
Location**

Latitude

Deg

38

Min

12

Sec

18

Longitude

Deg

89

Min

51

Sec

16

**Vessel LORAN Coordinates****Part B. Population Information****Population  
Density**

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

☒

0 - 50 persons

☐

101 - 500 persons

☐

more than 1000 persons

☐

51 - 100 persons

☐

501 - 1000 persons

**Sensitive  
Populations  
and  
Ecosystems  
Within One  
Mile Radius**Sensitive Populations or Ecosystems  
(e.g., schools, hospitals, wetlands, wildlife preserves, etc.)

None

Distance and direction from facility

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 826306

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 1

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 1.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 *factors* ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:**

826306

**Name of Source:**

Baldwin Energy Complex - Unit 1

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐ ) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 605 ft. feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area:        square feet or square meters.

☒ **SURFACE WATER**        (stream       , lake       , or other        )

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order:        or average flow rate:        cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake:        acres and average depth of lake:        meters.

☒ **SOIL OR GROUND WATER**       

If the release is on or under ground, indicate the distance to the closest water well.

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft. feet or meters

Gas Exit Velocity 123 ft/sec feet/second or  
meters/second

Gas Temperature 325 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity        feet/second  
of Surface Water

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

826306

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

#### Name of Source:

Baldwin Energy Complex - Unit 1

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
Ammonia	7661-41-7	346	0	338	107682 lbs Jan-Dec

What about H<sub>2</sub>O, H<sub>2</sub>SO<sub>4</sub>?

No change in H<sub>2</sub>O, H<sub>2</sub>SO<sub>4</sub> as per letter of 3/6/08

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*	Normal Range of Mixture (in lbs. or kg per day)*	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
			Upper Bound	Upper Bound			
			Lower Bound	Lower Bound			

Name of Mixture

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 826306

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 2

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 2.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 (P&ID) ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:** 826306

**Name of Source:** Baldwin Energy Complex - Unit 2

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐ ) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 605 ft. feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area:        square feet or square meters.

☒ **SURFACE WATER**        (stream       , lake       , or other        )

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order:        or average flow rate:        cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake:        acres and average depth of lake:        meters.

☒ **SOIL OR GROUND WATER**       

If the release is on or under ground, indicate the distance to the closest water well.

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft. feet or meters

Gas Exit Velocity 145 ft/sec feet/second or  
meters/second

Gas Temperature 306 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity        feet/second  
of Surface Water

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

826306

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a *SEPARATE* sheet for *EACH* source. Photocopy this page if necessary.

#### Name of Source:

Baldwin Energy Complex - Unit 2

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)* Upper Bound Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
Ammonia	7661-41-7	346 0	283	88250 lbs	Jan-Dec

*used about 3/6 kg to 4/5*

*No Change in  $10^2$  kg or as per letter of 3/6/08*

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)* Upper Bound Lower Bound	Normal Range of Mixture (in lbs. or kg per day)* Upper Bound Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
Not Applicable							

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION III: SUBSTANCE  
INFORMATION**

CR-ERNS Number: 826306

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:**

Ammonia CAS #7664-41-7

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of  
the Release (specify lbs., kg, or Ci)

Baldwin Energy Complex - Unit 1

346 lbs

Baldwin Energy Complex - Unit 2

346 lbs

*what about unit 3?*  
*no change in unit 3 releases*  
*per letter of 3/4/08*

**TOTAL - SSI trigger for this hazardous substance release\* :** 792 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*



2005

**SECTION I: GENERAL INFORMATION**

CR-ERNS Number: 826306

Date of Initial Release: Ongoing

Date of Initial Call to NRC: 02/12/2007

**Type of Report:** Indicate below the type of report you are submitting.

Initial Written Notification

First Anniversary  
Follow-up  
ReportWritten Notification  
of a Change to  
Initial NotificationWritten Notification  
of a Change to  
Follow-up Report**Signed Statement:** I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Sam Krueger, Managing Director

Name and Position

3/22/07

Date

Sam Krueger  
Signature**Part A. Facility or Vessel Information**

Name of Facility or Vessel

Baldwin Energy Complex

**Person in Charge of Facility or Vessel**

Name of Person in Charge

Sam Krueger

Position

Managing Director

Telephone No. (618)

785-3212

Alternate Telephone No. (618)

785-3244

**Facility Address or Vessel Port of Registration**

Street

10901 Baldwin Road

County

Randolph

City

Baldwin

State

IL

Zip Code

62217

Dun and Bradstreet Number for Facility

804405074

**Facility/Vessel Location**

Latitude

Deg

38

Min

12

Sec

18

Longitude

Deg

89

Min

51

Sec

16

**Vessel LORAN Coordinates****Part B. Population Information****Population Density**

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

☒

0 - 50 persons

☐

101 - 500 persons

☐

more than 1000 persons

☐

51 - 100 persons

☐

501 - 1000 persons

**Sensitive Populations and Ecosystems Within One Mile Radius**Sensitive Populations or Ecosystems  
(e.g., schools, hospitals, wetlands, wildlife preserves, etc.)

Distance and direction from facility

none [unclear]

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 826306

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 1

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 1.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate  
☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:**

826306

**Name of Source:**

Baldwin Energy Complex - Unit 1

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a waste pile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐ ) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 605 ft. feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area:        square feet or square meters.

☒ **SURFACE WATER**        (stream       , lake       , or other       )

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order:        or average flow rate:        cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake:        acres and average depth of lake:        meters.

☒ **SOIL OR GROUND WATER**       

If the release is on or under ground, indicate the distance to the closest water well.

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft. feet or meters

Gas Exit Velocity 123 ft/sec feet/second or  
meters/second

Gas Temperature 325 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity        feet/second  
of Surface Water

**SECTION II: SOURCE INFORMATION**  
(continued)

CR-ERNS Number: 826306

**Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source**

*Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 1

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Ammonia	7661-41-7	112	0	264	26,990 lbs	Jan-Dec

HC  
H<sub>2</sub>  
AS

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
			Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Name of Mixture									

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 826306

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 2

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 2.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate  
☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:**

826306

**Name of Source:**

Baldwin Energy Complex - Unit 2

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

- If identified source is a **stack**, indicate stack height: 605 ft feet or meters; **OR**
- If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: \_\_\_\_\_ square feet or square meters.

☒ **SURFACE WATER** \_\_\_\_\_ (stream \_\_\_\_\_, lake \_\_\_\_\_, or other \_\_\_\_\_)

- If the release affects any **surface water body**, give the name of the water body.  
\_\_\_\_\_
- If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order: \_\_\_\_\_ or average flow rate: \_\_\_\_\_ cubic feet/second; **OR**
- If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake: \_\_\_\_\_ acres and average depth of lake: \_\_\_\_\_ meters.

☒ **SOIL OR GROUND WATER** \_\_\_\_\_

If the release is on or under ground, indicate the distance to the closest water well.  
\_\_\_\_\_

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

• For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft feet or meters

Gas Exit Velocity 145 ft/sec feet/second or  
meters/second

Gas Temperature 306 F degrees Fahrenheit,  
Kelvin, or Celsius

• For a release to surface water, provide the following information, if available:

Average Velocity \_\_\_\_\_ feet/second  
of Surface Water

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

826306

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a *SEPARATE* sheet for *EACH* source. Photocopy this page if necessary.

Name of Source:

Baldwin Energy Complex - Unit 2

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Ammonia	7661-41-7	115	0	343	36,300 lbs	Jan-Dec

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Normal Range of Components				Normal Range of Mixture		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Weight Percentage	(in lbs. or kg per day)* Upper Bound	(in lbs. or kg per day)* Lower Bound	(in lbs. or kg per day)* Upper Bound	(in lbs. or kg per day)* Lower Bound				
Name of Mixture										

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

**SECTION III: SUBSTANCE  
INFORMATION**

CR-ERNS Number:

826306

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:**

Ammonia CAS #7664-41-7

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

**Name of Source(s)**

**Upper Bound of the Normal Range of  
the Release (specify lbs., kg, or Ci)**

Baldwin Energy Complex - Unit 1

112 lbs

Baldwin Energy Complex - Unit 2

115 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 227 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*



**SECTION I: GENERAL  
INFORMATION**

CR-ERNS Number: 625807

Date of Initial Release: Ongoing

Date of Initial Call to NRC: 10/11/2002

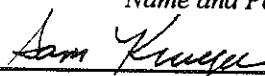
**Type of Report:** Indicate below the type of report you are submitting.☐ Initial Written Notification☐ First Anniversary  
Follow-up  
Report☐ Written Notification  
of a Change to  
Initial Notification☒ Written Notification  
of a Change to  
Follow-up Report**Signed Statement:** I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Sam Krueger, Managing Director

Name and Position

2/28/2006

Date

  
Signature**Part A. Facility or Vessel Information**

Name of Facility or Vessel

Baldwin Energy Complex

Person  
in Charge  
of Facility  
or Vessel

Name of Person in Charge

Sam Krueger

Position

Managing Director

Telephone No. (618)

785-3212

Alternate Telephone No. (618)

785-3244

Facility  
Address or  
Vessel  
Port of  
Registration

Street

10901 Baldwin Road

County

Randolph

City

Baldwin

State

IL

Zip Code

62217

Dun and Bradstreet Number for Facility

804405074

Facility/Vessel  
Location

Latitude

Deg

38

Min

12

Sec

18

Longitude

Deg

89

Min

51

Sec

16

Vessel LORAN Coordinates

**Part B. Population Information**Population  
Density

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

☒

0 - 50 persons

☐

101 - 500 persons

☐

more than 1000 persons

☐

51 - 100 persons

☐

501 - 1000 persons

Sensitive  
Populations  
and  
Ecosystems  
Within One  
Mile RadiusSensitive Populations or Ecosystems  
(e.g., schools, hospitals, wetlands, wildlife preserves, etc.)

Distance and direction from facility

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 1

1. Indicate whether the release from this source is either:

continuous without interruption ☒ OR routine, anticipated, intermittent ☐.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 1.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION  
(continued)**

CR-ERNS Number:

625807

Name of Source:

Baldwin Energy Complex - Unit 1

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐ ) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

- If identified source is a **stack**, indicate stack height: 605 ft. feet or meters; **OR**
- If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area:        square feet or square meters.

☒ **SURFACE WATER**        (stream       , lake       , or other        )

- If the release affects any **surface water body**, give the name of the water body.
- If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order:        or average flow rate:        cubic feet/second; **OR**
- If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake:        acres and average depth of lake:        meters.

☒ **SOIL OR GROUND WATER**       

If the release is on or under ground, indicate the distance to the closest water well.  
      

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft. feet or meters

Gas Exit Velocity 123 ft/sec feet/second or  
meters/second

Gas Temperature 325 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity        feet/second  
of Surface Water

# SECTION II: SOURCE INFORMATION

(continued)

CR-ERNS Number:

625807

**Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source**  
*Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

Name of Source:

Baldwin Energy Complex - Unit 1

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*		Months of the Release
		Upper Bound	Lower Bound		Upper Bound	Lower Bound	
Arsenic Compounds	7440-38-2	3 lbs.	0	336	871 lbs.		Jan. thru Dec.
Barium Compounds	7440-39-3	27 lbs.	0	336	8,733 lbs.		Jan. thru Dec.
Hydrogen Fluoride	7664-39-3	522 lbs.	0	336	166,898 lbs.		Jan. thru Dec.
Mercury Compounds	7439-97-6	0.65 lbs.	0	336	209 lbs.		Jan. thru Dec.

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Normal Range of Components Weight (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)		Months of the Release
			Upper Bound	Lower Bound	Upper Bound	Lower Bound		Upper Bound	Lower Bound	
Not Applicable										

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:** Baldwin Energy Complex - Unit 2

1. Indicate whether the release from this source is either:

continuous without interruption ☒ OR routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 2.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

*\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.*

**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:**

625807

**Name of Source:**

Baldwin Energy Complex - Unit 2

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 605 ft feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: \_\_\_\_\_ square feet or square meters.

☒ **SURFACE WATER** \_\_\_\_\_ (stream \_\_\_\_\_, lake \_\_\_\_\_, or other \_\_\_\_\_)

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order: \_\_\_\_\_ or average flow rate: \_\_\_\_\_ cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake: \_\_\_\_\_ acres and average depth of lake: \_\_\_\_\_ meters.

☒ **SOIL OR GROUND WATER** \_\_\_\_\_

If the release is on or under ground, indicate the distance to the closest water well.

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft feet or meters

Gas Exit Velocity 145 ft/sec feet/second or  
meters/second

Gas Temperature 306 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity \_\_\_\_\_ feet/second  
of Surface Water

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source:

Baldwin Energy Complex - Unit 2

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Arsenic Compounds	7440-38-2	3 lbs.	0	312	813 lbs.	Jan. thru Dec.
Barium Compounds	7440-39-3	27 lbs.	0	312	8,152 lbs.	Jan. thru Dec.
Hydrogen Fluoride	7664-39-3	522 lbs.	0	312	155,778 lbs.	Jan. thru Dec.
Mercury Compounds	7439-97-6	0.65 lbs.	0	312	195 lbs.	Jan. thru Dec.

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Weight Percentage	Upper Bound	Lower Bound	Upper Bound			

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 3

1. Indicate whether the release from this source is either:

continuous without interruption ☒ OR routine, anticipated, intermittent ☐.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 3.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.



**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:**

625807

**Name of Source:**

Baldwin Energy Complex - Unit 3

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 605 ft feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area:        square feet or square meters.

☒ **SURFACE WATER**        (stream       , lake       , or other       )

If the release affects any **surface water body**, give the name of the water body.  
      

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order:        or average flow rate:        cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake:        acres and average depth of lake:        meters.

☒ **SOIL OR GROUND WATER**       

If the release is on or under ground, indicate the distance to the closest water well.  
      

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft feet or meters

Gas Exit Velocity 144 ft/sec feet/second or  
meters/second

Gas Temperature 310 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity        feet/second  
of Surface Water

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

#### Name of Source:

Baldwin Energy Complex - Unit 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Arsenic Compounds	7440-38-2	3 lbs.	0	327	866 lbs.	Jan. thru Dec.
Barium Compounds	7440-39-3	28 lbs.	0	327	8,680 lbs.	Jan. thru Dec.
Hydrogen Fluoride	7664-39-3	535 lbs.	0	327	165,876 lbs.	Jan. thru Dec.
Mercury Compounds	7439-97-6	0.68 lbs.	0	327	208 lbs.	Jan. thru Dec.

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage		Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
			Upper Bound	Lower Bound	Upper Bound	Lower Bound	Upper Bound	Lower Bound			

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION III: SUBSTANCE  
INFORMATION**

CR-ERNS Number: 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:**

Arsenic Compounds CAS #7440-38-2

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of  
the Release (specify lbs., kg. or Ci)

Baldwin Energy Complex - Unit 1	3 lbs
Baldwin Energy Complex - Unit 2	3 lbs
Baldwin Energy Complex - Unit 3	3 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 9 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION III: SUBSTANCE  
INFORMATION**

CR-ERNS Number: 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:**

Barium CAS # 7440-39-3

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of  
the Release (specify lbs., kg, or Ci)

Baldwin Energy Complex - Unit 1	27 lbs
Baldwin Energy Complex - Unit 2	27 lbs
Baldwin Energy Complex - Unit 3	28 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 83 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION III: SUBSTANCE  
INFORMATION**

CR-ERNS Number: 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:** Hydrogen Fluoride CAS # 7664-39-3

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

<u>Name of Source(s)</u>	<u>Upper Bound of the Normal Range of the Release (specify lbs., kg, or Ci)</u>
Baldwin Energy Complex - Unit 1	522 lbs
Baldwin Energy Complex - Unit 2	522 lbs
Baldwin Energy Complex - Unit 3	535 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 1579 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION III: SUBSTANCE  
INFORMATION**

CR-ERNS Number: 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:**

Mercury Compounds CAS # 7439-97-6

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of  
the Release (specify lbs., kg, or Ci)

Baldwin Energy Complex - Unit 1	0.65 lbs
Baldwin Energy Complex - Unit 2	0.65 lbs
Baldwin Energy Complex - Unit 3	0.68 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 1.98 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION I: GENERAL  
INFORMATION****CR-ERNS Number:** 625807**Date of Initial Release:** Ongoing**Date of Initial Call to NRC:** 10/11/2002**Type of Report:** Indicate below the type of report you are submitting.

☐ Initial Written Notification ☐ First Anniversary  
☐ Follow-up Report ☐ Written Notification  
of a Change to Initial Notification ☒ Written Notification  
of a Change to Follow-up Report

**Signed Statement:** I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Keith A. McFarland, Vice President

Name and Position

2/23/2005

Date

Signature

**Part A. Facility or Vessel Information****Name of Facility or Vessel**

Baldwin Energy Complex

**Person  
in Charge  
of Facility  
or Vessel**

Name of Person in Charge

Sam Krueger

Position

Managing Director

Telephone No. (618)

785-3212

Alternate Telephone No. (618)

785-3244

**Facility  
Address or  
Vessel  
Port of  
Registration**

Street

10901 Baldwin Road

County

Randolph

City

Baldwin

State

IL

Zip Code

62217

**Dun and Bradstreet Number for Facility**

804405074

**Facility/Vessel  
Location**

Latitude

Deg

38

Min

12

Sec

18

Longitude

Deg

89

Min

51

Sec

16

**Vessel LORAN Coordinates****Part B. Population Information****Population  
Density**

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

☒

0 - 50 persons

☐

101 - 500 persons

☐

more than 1000 persons

☐

51 - 100 persons

☐

501 - 1000 persons

**Sensitive  
Populations  
and  
Ecosystems  
Within One  
Mile Radius**

Sensitive Populations or Ecosystems  
(e.g., schools, hospitals, wetlands, wildlife preserves, etc.)

Distance and direction from facility

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a *SEPARATE* sheet for *EACH* source. Photocopy this page if necessary.

#### Name of Source:

Baldwin Energy Complex - Unit 2

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Hydrogen Fluoride	7664-39-3	386 lbs.	0	344	125,731 lbs.	Jan. thru Dec.

*no report - no change*  
*ARSENIC - no change*

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*				Normal Range of Mixture (in lbs. or kg per day)*	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
			Upper Bound	Lower Bound	Upper Bound	Lower Bound				
Not Applicable										

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.



**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:**

625807

**Name of Source:**

Baldwin Energy Complex - Unit 2

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a **SEPARATE** sheet for **EACH** source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐ ) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 605 ft. feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: \_\_\_\_\_ square feet or square meters.

☐ **SURFACE WATER** \_\_\_\_\_ (stream \_\_\_\_\_, lake \_\_\_\_\_, or other \_\_\_\_\_)

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

stream order: \_\_\_\_\_ or average flow rate: \_\_\_\_\_ cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

surface area of lake: \_\_\_\_\_ acres and average depth of lake: \_\_\_\_\_ meters.

☐ **SOIL OR GROUND WATER** \_\_\_\_\_

If the release is on or under ground, indicate the distance to the closest water well.

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft. feet or meters

Gas Exit Velocity 115 ft/sec feet/second or  
meters/second

Gas Temperature 306 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity \_\_\_\_\_ feet/second  
of Surface Water

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source:

Baldwin Energy Complex - Unit 2

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Barium	7440-39-3	21 lbs	0	344	6921	Jan. thru Dec.

*Not Regulated, therefore no data listed*

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Weight Percentage		Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Upper Bound	Lower Bound	Upper Bound	Lower Bound				
Name of Mixture									

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION II: SOURCE  
INFORMATION****CR-ERNS Number:** 625807**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 3

1. Indicate whether the release from this source is either:

continuous without interruption ☒ OR routine, anticipated, intermittent ☐.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 3.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 3

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of coal in Unit 3.

Subhd (TYPE

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate  
☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:**

625807

**Name of Source:**

Baldwin Energy Complex - Unit 3

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 605 ft. feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area:        square feet or square meters.

☒ **SURFACE WATER**        (stream       , lake       , or other       )

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order:        or average flow rate:        cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake:        acres and average depth of lake:        meters.

☒ **SOIL OR GROUND WATER**       

If the release is on or under ground, indicate the distance to the closest water well.

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft. feet or meters

Gas Exit Velocity 126ft/sec feet/second or  
meters/second

Gas Temperature 335 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity        feet/second  
of Surface Water

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source:

Baldwin Energy Complex - Unit 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Hydrogen Fluoride	7664-39-3	396 lbs.	0	342	131,189 lbs.	Jan. thru Dec.

MEASURED - NO CHANGE  
APPROXIMATE - NO CHANGE

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Hazardous Substance Components	CASRN#	Weight Percentage		Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
			Upper Bound	Lower Bound	Upper Bound	Lower Bound					
Not Applicable											

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

**SECTION II: SOURCE INFORMATION**  
(continued)

CR-ERNS Number:

625807

**Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source**

*Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Barium	7440-39-3	22 lbs	0	342	7221 lbs	Jan. thru Dec.

*Not Regulated, therefore not listed*

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Name of Mixture		Weight Percentage						

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION III: SUBSTANCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:** Hydrogen Fluoride CAS # 7664-39-3

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of  
the Release (specify lbs., kg, or Ci)

Baldwin Energy Complex - Unit 1	386 lbs
Baldwin Energy Complex - Unit 2	386 lbs
Baldwin Energy Complex - Unit 3	396 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 1168 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*



**SECTION III: SUBSTANCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:**

Barium CAS # 7440-39-3

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of  
the Release (specify lbs., kg, or Ci)

Baldwin Energy Complex - Unit 1	21 lbs
Baldwin Energy Complex - Unit 2	21 lbs
Baldwin Energy Complex - Unit 3	22 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 64 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION II: SOURCE  
INFORMATION****CR-ERNS Number: 625807****Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:** Baldwin Energy Complex - Unit 1

1. Indicate whether the release from this source is either:

continuous without interruption ☒ OR routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 1.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate  
☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 1

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of coal in Unit 1.

*Substantiated 7/1/96*

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:**

625807

**Name of Source:**

Baldwin Energy Complex - Unit 1

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area \_\_\_\_\_) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 605 ft. feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: \_\_\_\_\_ square feet or square meters.

☒ **SURFACE WATER** \_\_\_\_\_ (stream \_\_\_\_\_, lake \_\_\_\_\_, or other \_\_\_\_\_)

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order: \_\_\_\_\_ or average flow rate: \_\_\_\_\_ cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake: \_\_\_\_\_ acres and average depth of lake: \_\_\_\_\_ meters.

☒ **SOIL OR GROUND WATER** \_\_\_\_\_

If the release is on or under ground, indicate the distance to the closest water well.

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft. feet or meters

Gas Exit Velocity 123 ft/sec feet/second or  
meters/second

Gas Temperature 325 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity \_\_\_\_\_ feet/second  
of Surface Water

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source:

Baldwin Energy Complex - Unit 1

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Hydrogen Fluoride	7664-39-3	386 lbs.	0	290	103,453 lbs.	Jan. thru Dec.

*mercury - no change*  
*arsenic - no change*

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
				Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Not Applicable										

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

#### Name of Source:

Baldwin Energy Complex - Unit 1

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Barium	7440-39-3	21 lbs	0	290	5694	Jan. thru Dec.

*Not entered as not regulated*

*Don't need separate sheet for each chemical*

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Upper Bound	Lower Bound	Upper Bound	Lower Bound			
		Weight Percentage						

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION II: SOURCE  
INFORMATION****CR-ERNS Number: 625807****Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:****Baldwin Energy Complex - Unit 2**

1. Indicate whether the release from this source is either:

continuous without interruption ☒ OR routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 2.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate  
☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(j)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 2

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of coal in Unit 2.

SO2  
TYPE

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.



**SECTION I: GENERAL INFORMATION****CR-ERNS Number:** 625807**Date of Initial Release:** Ongoing**Date of Initial Call to NRC:** 10/11/2002**Type of Report:** Indicate below the type of report you are submitting.

☐ Initial Written Notification ☒ First Anniversary Follow-up Report ☐ Written Notification of a Change to Initial Notification ☐ Written Notification of a Change to Follow-up Report

**Signed Statement:** I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Richard W. Eimer, Jr., Sr. Vice President

1/26/2004

Date

*Richard W. Eimer, Jr.*  
Signature

**Part A. Facility or Vessel Information****Name of Facility or Vessel**

Baldwin Energy Complex

**Person in Charge of Facility or Vessel**

Name of Person in Charge

Sam Krueger

Position

Managing Director

Telephone No. (618) 785-3212

Alternate Telephone No. (618) 785-3244

**Facility Address or Vessel Port of Registration**

Street

10901 Baldwin Road

County

Randolph

City

Baldwin

State

IL

Zip Code

62217

**Dun and Bradstreet Number for Facility**

804405074

**Facility/Vessel Location**

Latitude

Deg 38

Min 12

Sec 18

Longitude

Deg 89

Min 51

Sec 16

**Vessel LORAN Coordinates****Part B. Population Information****Population Density**

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

☒ 0 - 50 persons☐ 101 - 500 persons☐ more than 1000 persons☐ 51 - 100 persons☐ 501 - 1000 persons**Sensitive Populations and Ecosystems Within One Mile Radius**

Sensitive Populations or Ecosystems  
(e.g., schools, hospitals, wetlands, wildlife preserves, etc.)

None

Distance and direction from facility

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 1

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 1.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

*\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.*

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 2

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 2.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 3

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Unit 3.

*No Part B  
Hazardous*

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 625807

### Part C. Identify and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

#### Name of Source:

Baldwin Energy Complex - Units 1, 2 and 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Arsenic	7440-38-2	6 lbs	0	323	629 lbs	Jan. thru Dec.
Unit 1		6 lbs	0	252	511 lbs	
Unit 2		2 lbs	0	342	676 lbs	

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	CASRN#	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Not Applicable		Weight Percentage						

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

#### Name of Source:

Baldwin Energy Complex - Units 1, 2 and 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Barium	7440-39-3					Jan. thru Dec.
Unit 1		21 lbs	0	323	6337 lbs	
Unit 2		21 lbs	0	252	5150 lbs	
Unit 3		21 lbs	0	342	6812 lbs	

Not a chemical

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Weight Percentage								

Name of Mixture

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

*Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

#### Name of Source:

Baldwin Energy Complex - Units 1, 2 and 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Hydrogen Fluoride	7664-39-3					Jan. thru Dec.
Unit 1 ✓		381 lbs	0	323	117,107 lbs	
Unit 2 ✓		382 lbs	0	252	95,519 lbs	
Unit 3 ✓		392 lbs	0	342	126,004 lbs	

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Name of Mixture		Weight Percentage						

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

## SECTION II: SOURCE INFORMATION (continued)

625807

CR-ERNS Number:

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a *SEPARATE* sheet for *EACH* source. Photocopy this page if necessary.

#### Name of Source:

Baldwin Energy Complex - Units 1, 2 and 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Mercury Compounds	7439-97-6	0.5 lbs	0	323	148 lbs	Jan. thru Dec.
Unit 1		0.5 lbs	0	252	120 lbs	
Unit 2		0.5 lbs	0	342	159 lbs	

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	CASRN#	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Not Applicable								

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.



**SECTION III: SUBSTANCE  
INFORMATION**

CR-ERNS Number: 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:**

Arsenic CAS # 7440-38-2

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of  
the Release (specify lbs., kg, or Ci)

Baldwin Energy Complex - Unit 1	2 lbs
Baldwin Energy Complex - Unit 2	2 lbs
Baldwin Energy Complex - Unit 3	2 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 6 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION III: SUBSTANCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:**

Barium CAS # 7440-39-3

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of  
the Release (specify lbs., kg, or Ci)

Baldwin Energy Complex - Unit 1	21 lbs
Baldwin Energy Complex - Unit 2	21 lbs
Baldwin Energy Complex - Unit 3	21 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 63 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION III: SUBSTANCE  
INFORMATION**

CR-ERNS Number: 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:** Hydrogen Fluoride CAS # 7664-39-3

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

<u>Name of Source(s)</u>	<u>Upper Bound of the Normal Range of the Release (specify lbs., kg, or Ci)</u>
Baldwin Energy Complex - Unit 1	381 lbs
Baldwin Energy Complex - Unit 2	382 lbs
Baldwin Energy Complex - Unit 3	392 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 1155 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION III: SUBSTANCE  
INFORMATION**

CR-ERNS Number: 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:** Mercury Compounds CAS # 7439-97-6

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

<u>Name of Source(s)</u>	<u>Upper Bound of the Normal Range of the Release (specify lbs., kg, or Ci)</u>
Baldwin Energy Complex - Unit 1	0.5 lbs
Baldwin Energy Complex - Unit 2	0.5 lbs
Baldwin Energy Complex - Unit 3	0.5 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 1.5 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION I: GENERAL INFORMATION**

CR-ERNS Number: 625807

Date of Initial Release: Ongoing

Date of Initial Call to NRC: 10/11/2002

**Type of Report:** Indicate below the type of report you are submitting.

☒ Initial Written Notification ☐ First Anniversary Follow-up Report ☒ Written Notification of a Change to Initial Notification ☐ Written Notification of a Change to Follow-up Report

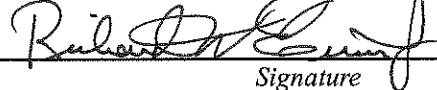
**Signed Statement:** I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Richard W. Eimer, Jr., Sr. Vice President

11/14/2002

Date

Name and Position



Signature

**Part A. Facility or Vessel Information**

Name of Facility or Vessel

Baldwin Energy Complex - Units 1, 2, and 3

**Person in Charge of Facility or Vessel**

Name of Person in Charge

Keith A. McFarland

Position

Vice President

Telephone No. (618) 785-3212

Alternate Telephone No. (618) 785-3244

**Facility Address or Vessel Port of Registration**

Street

10901 Baldwin Road

County

Randolph

City

Baldwin

State

IL

Zip Code

62217

Dun and Bradstreet Number for Facility

804405074

**Facility/Vessel Location**

Latitude Deg 38 Min 12 Sec 18  
Longitude Deg 89 Min 51 Sec 16

**Vessel LORAN Coordinates****Part B. Population Information****Population Density**

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

☒ 0 - 50 persons ☐ 101 - 500 persons ☐ more than 1000 persons  
☐ 51 - 100 persons ☐ 501 - 1000 persons

**Sensitive Populations and Ecosystems Within One Mile Radius**

Sensitive Populations or Ecosystems  
(e.g., schools, hospitals, wetlands, wildlife preserves, etc.)

None

Distance and direction from facility

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Units 1, 2, and 3

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of sub-bituminous coal in Units 1, 2 and 3.

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☒ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load from all three units in a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

## SECTION II: SOURCE INFORMATION (continued)

625807

CR-ERNS Number:

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

#### Name of Source:

Baldwin Energy Complex - Units 1, 2 and 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Mercury Compounds	7439-97-6					Jan. thru Dec.
Unit 1		0.6 lbs	0	365	157 lbs	
Unit 2		0.7 lbs	0	365	186 lbs	
Unit 3		0.5 lbs	0	365	133 lbs	

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
			Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Name of Mixture									

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION I: GENERAL INFORMATION**

CR-ERNS Number: 625807

Date of Initial Release: Ongoing

Date of Initial Call to NRC: 10/11/2002

**Type of Report:** Indicate below the type of report you are submitting.

☒ Initial Written Notification ☐ First Anniversary Follow-up Report ☐ Written Notification of a Change to Initial Notification ☐ Written Notification of a Change to Follow-up Report

**Signed Statement:** I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Richard W. Eimer, Jr., Sr. Vice President

11/6/2002

Date

Name and Position

Signature

**Part A. Facility or Vessel Information**

Name of Facility or Vessel

Baldwin Energy Complex

Person in Charge of Facility or Vessel

Name of Person in Charge

Keith A. McFarland

Position

Vice President

Telephone No. (618)

785-3212

Alternate Telephone No. (618)

785-3244

Facility Address or Vessel Port of Registration

Street

10901 Baldwin Road

County

Randolph

City

Baldwin

State

IL

Zip Code

62217

Dun and Bradstreet Number for Facility

804405074

Facility/Vessel Location

Latitude

Deg 38

Min 12

Sec 18

Longitude

Deg 89

Min 51

Sec 16

Vessel LORAN Coordinates

**Part B. Population Information**

Population Density

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

☒ 0 - 50 persons☐ 101 - 500 persons☐ more than 1000 persons☐ 51 - 100 persons☐ 501 - 1000 persons

Sensitive Populations and Ecosystems Within One Mile Radius

Sensitive Populations or Ecosystems (e.g., schools, hospitals, wetlands, wildlife preserves, etc.)

Distance and direction from facility



**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 1

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of coal in Unit 1.

*Severed*

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 2

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent ☐.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of coal in Unit 2.

*Superseded*

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data ☐ Knowledge of the facility/vessel's operations and release history ☐ Engineering estimate

☒ AP-42 ☐ Best professional judgment ☐ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.**

*For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 3

1. Indicate whether the release from this source is either:

continuous without interruption ☒ **OR** routine, anticipated, intermittent \_\_\_\_\_.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.\*

Baldwin generates electricity by the combustion of coal in Unit 3.

*Simple carbon*

3. Identify below how you established the pattern of release and calculated release estimates.

☒ Past release data      \_\_\_\_\_ Knowledge of the facility/vessel's operations and release history      \_\_\_\_\_ Engineering estimate

☒ AP-42      \_\_\_\_\_ Best professional judgment      \_\_\_\_\_ Other (explain)

Reporting is based on generation at maximum load for a 24-hour period.

\* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:** 625807

**Name of Source:** Baldwin Energy Complex - Unit 1

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐ ) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

- If identified source is a **stack**, indicate stack height: 605 ft. feet or meters; **OR**
- If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area:        square feet or square meters.

☒ **SURFACE WATER**        (stream        , lake        , or other        )

- If the release affects any **surface water body**, give the name of the water body.
- If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order:        or average flow rate:        cubic feet/second; **OR**
- If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake:        acres and average depth of lake:        meters.

☒ **SOIL OR GROUND WATER**       

If the release is on or under ground, indicate the distance to the closest water well.  
      

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft. feet or meters

Gas Exit Velocity 123 ft/sec feet/second or  
meters/second

Gas Temperature 325 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity        feet/second  
of Surface Water

**SECTION II: SOURCE  
INFORMATION  
(continued)**

**CR-ERNS Number:** 625807

**Name of Source:** Baldwin Energy Complex - Unit 2

**Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐ ) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 605 ft. feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area:        square feet or square meters.

☒ **SURFACE WATER** ☐ (stream ☐ , lake ☐ , or other ☐ )

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order:        or average flow rate:        cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake:        acres and average depth of lake:        meters.

☒ **SOIL OR GROUND WATER** ☐

If the release is on or under ground, indicate the distance to the closest water well.

**Optional Information**

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft. feet or meters

Gas Exit Velocity 115 ft/sec feet/second or  
meters/second

Gas Temperature 306 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity        feet/second  
of Surface Water

## SECTION II: SOURCE INFORMATION (continued)

**CR-ERNS Number:**

625807

**Name of Source:**

### Baldwin Energy Complex - Unit 3

### **Part B: Specific Information on the Source**

*For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**AFFECTED MEDIUM.** Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

⊗ AIR x (stack x or area     ) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 605 ft. feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: \_\_\_\_\_ square feet or square meters.

☒ **SURFACE WATER** \_\_\_\_\_ (stream \_\_\_\_\_, lake \_\_\_\_\_, or other \_\_\_\_\_)

2. If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.  
stream order: \_\_\_\_\_ or average flow rate: \_\_\_\_\_ cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.  
surface area of lake: \_\_\_\_\_ acres and average depth of lake: \_\_\_\_\_ meters.

☒ SOIL OR GROUND WATER \_\_\_\_\_

If the release is on or under ground, indicate the distance to the closest water well.

### Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 19.5 ft. feet or meters

Gas Exit Velocity 126ft/sec feet/second or  
meters/second

Gas Temperature 335 F degrees Fahrenheit,  
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity \_\_\_\_\_ feet/second  
of Surface Water

**SECTION II: SOURCE INFORMATION**  
(continued)

CR-ERNS Number:

625807

**Part C. Identify and Quantity of Each Hazardous Substance or Mixture Released From Each Source**

*Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Unit 1

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Hydrogen Fluoride	7664-39-3	234 lbs.	0	281 days	61,058 lbs.	Jan. thru Dec.

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Weight Percentage		Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Upper Bound	Lower Bound	Upper Bound	Lower Bound					

Name of Mixture

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number:

625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a *SEPARATE* sheet for *EACH* source. Photocopy this page if necessary.

Name of Source:

Baldwin Energy Complex - Unit 2

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Hydrogen Fluoride	7664-39-3	233 lbs.	0	329	70,728 lbs.	Jan. thru Dec.

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Weight Percentage		Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
		Upper Bound	Lower Bound	Upper Bound	Lower Bound	Upper Bound	Lower Bound			

Name of Mixture

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.



## SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 625807

### Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

#### Name of Source:

Baldwin Energy Complex - Unit 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Hydrogen Fluoride	7664-39-3	209 lbs.	0	250	52,626 lbs.	Jan. thru Dec.

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
			Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Name of Mixture									

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION II: SOURCE INFORMATION**  
(continued)

CR-ERNS Number: 625807

**Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source**

*Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.*

**Name of Source:**

Baldwin Energy Complex - Units 1, 2 and 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)* Upper Bound Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
Mercury Compounds	7439-97-6	1.8 lbs 0	365	476 lbs.	Jan. thru Dec.

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)* Upper Bound Lower Bound	Normal Range of Mixture (in lbs. or kg per day)* Upper Bound Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
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Name of Mixture

Not Applicable

\* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION III: SUBSTANCE  
INFORMATION**

CR-ERNS Number: 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:** Hydrogen Fluoride CAS # 7664-39-3

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

<u>Name of Source(s)</u>	<u>Upper Bound of the Normal Range of the Release (specify lbs., kg, or Ci)</u>
Baldwin Energy Complex - Unit 1	234 lbs
Baldwin Energy Complex - Unit 2	233 lbs
Baldwin Energy Complex - Unit 3	209 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 676 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION III: SUBSTANCE  
INFORMATION**

**CR-ERNS Number:** 625807

**Calculation of the SSI Trigger**

*For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.*

**Name of Hazardous Substance:** Mercury Compounds CAS # 7439-97-6

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

<u>Name of Source(s)</u>	<u>Upper Bound of the Normal Range of the Release (specify lbs., kg, or Ci)</u>
Baldwin Energy Complex - Unit 1	0.6 lbs
Baldwin Energy Complex - Unit 2	0.7 lbs
Baldwin Energy Complex - Unit 3	0.5 lbs

**TOTAL - SSI trigger for this hazardous substance release\* :** 1.8 lbs

*\* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*